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Attorneys for Defendant,  
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David J. Mahoney

Hearing Date: November 16, 2023  
Time: 11:30 a.m.

Objection Date: November 9, 2023  
Time: 4:00 p.m.

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

GILLIAN JORDAN, a/k/a GILLIAN  
MARGARET JORDAN-DE VERTEIUL,

Chapter 7

Case No.: 22-40568 (NHL)

Debtor.

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GILLIAN JORDAN a/k/a GILLIAN  
MARGARET JORDAN-DE VERTEUIL,

Plaintiff,

Adv. Pro. No. 23-01064 (NHL)

-against-

DOUG NAIDUS, WBL SPE III, LLC,  
WORLD BUSINESS LENDERS, LLC,  
THE BANK OF LAKE MILLS,  
WORLDWIDE LAND TRANSFER,  
JOHN DOES 1-3,

Defendants.

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**NOTICE OF MOTION SEEKING  
AN ORDER DISMISSING THE ADVERSARY COMPLAINT**

**PLEASE TAKE NOTICE**, that the Bank of Lake Mills (the “BLM”) pursuant to Federal Rule of Civil Procedure 12(b)(6), will move before the Honorable Nancy H. Lord, United States Bankruptcy Judge, of the United States Bankruptcy Court for the Eastern District of New York, on **November 16, 2023 at 11:30 a.m.** (the “Hearing”), or as soon thereafter as counsel can be heard, for entry of an order dismissing the Complaint in the above-captioned adversary proceeding pursuant to Fed. R. Civ. P. 12(b)(6), made applicable by Fed. R. Bankr. P. 7012(b), (the “Motion”).

**PLEASE TAKE FURTHER NOTICE**, that, Judge Nancy Hershey-Lord conducts hearings telephonically and by videoconference. All participants must register with eCourt Appearances in advance of all telephonic and videoconference appearances. eCourt Appearances registration is required by both attorneys and non-attorney participants. Attorneys with a CM/ECF account may find the program under the “Utilities” menu after logging on to CM/ECF.

**PLEASE TAKE FURTHER NOTICE**, that, prior to the Hearing, any party wishing to appear at the Hearing is required to register their appearance at least two (2) business days in advance of the Hearing using the Court’s eCourt Appearances platform: <https://ecf.nyeb.uscourts.gov/cgi-bin/nyebAppearances.pl>. The Dial in Number and Access Code to appear at the telephonic hearing on the Motion scheduled for **November 16, 2023 at 11:30 a.m.** before the Honorable Nancy Hershey Lord, are as follows: the Dial in Number is 888-363-4734, and the Access Code is 4702754. Those parties that are unable to access eCourt Appearances must email Judge Nancy Hershey-Lord’s Courtroom Deputy at: [nhl\\_hearings@nyeb.uscourts.gov](mailto:nhl_hearings@nyeb.uscourts.gov) at least two (2) business days prior to the Hearing. Your email must include your name, the case number(s), who you represent (if you are an attorney), hearing date, and phone number.

**PLEASE TAKE FURTHER NOTICE**, that objections to the Motion, if any, must: (i) be in writing; (ii) conform to the Bankruptcy Rules and the Local Rules; (iii) set forth the name of the objecting party, the basis for the objection, and the specific grounds therefore; and (iv) be filed with this Court electronically in accordance with General Order 559 (General Order 559 and the User’s Manual for the Electronic Filing Case System can be found at <http://www.nyeb.uscourts.gov>, the official website for this Court), by registered users of this Court’s electronic case filing system, and by all other parties in interest, on a disk, in Portable

Document Format (PDF), Word Perfect or any other Windows-based word processing format with the Clerk of the Bankruptcy Court at the United States Bankruptcy Court for the Eastern District of New York at Brooklyn, located at Conrad B. Duberstein U.S. Courthouse, 271-C Cadman Plaza East, Suite 1595, Brooklyn, New York 11201, with a courtesy copy to the Chambers of the Honorable Nancy Hershey Lord, United States Bankruptcy Judge at the United States Bankruptcy Court for the Eastern District of New York, located at Conrad B. Duberstein Courthouse, 271-C Cadman Plaza East – Suite 1595, Brooklyn, NY 11201, and be served upon Debra Kramer, Chapter 7 Trustee, SilvermanAcampora LLP, 100 Jericho Quadrangle, Suite 300, Jericho, New York 11753, Attn: David J. Mahoney, Esq., so as to be received no later than **November 9, 2023 at 4:00 p.m.**

**PLEASE TAKE FURTHER NOTICE**, that the Hearing may be adjourned without further notice other than the announcement of such adjournment in open Court, or the filing of a notice of adjournment on the docket of the Debtor's case and/or the Adversary Proceeding.

Dated: Jericho, New York  
October 10, 2023

**RIMON P.C.**  
Counsel to Defendant,  
The Bank of Lake Mills

By: /s/ David J. Mahoney  
David J. Mahoney  
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